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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

PEGGY CALDERON TROTMAN,

Plaintiff,

-against-

DELTA AIRLINES, INC.,

Defendant.

Docket No.: 1:21-cv-04441-JGK

**RULE 26(f) REPORT &  
PROPOSED DISCOVERY PLAN**

*Schedule Only*

The parties have conferred pursuant F.R.C.P. 26(f) pursuant to this Court's Order dated July 14, 2021, and hereby submit the following proposed joint discovery plan:

A. What changes should be made in the timing, form, or requirement for disclosures under Rule 26(a), including a statement as to when disclosures under Rule 26(a)(1) were made or will be made:

- The parties shall serve their Initial Disclosures by August 10, 2021.

B. The subjects on which discovery may be needed, when discovery should be completed, and whether discovery should be conducted in phases or be limited to or focused on particulars issues:

- Discovery is needed concerning all allegations contained in Plaintiff's Complaint, Plaintiff's claimed injuries and medical treatment, and any special damages that will be claimed.
- Written Discovery:
  - Parties shall serve document requests and interrogatories by August 17, 2021.
  - Parties shall respond to document requests and interrogatories by September 24, 2021.
- Depositions:
  - The deposition of Plaintiff shall occur on or before October 25, 2021.
  - The deposition of Defendant shall occur on or before November 19, 2021.
- Amendment of Pleadings:
  - Parties shall amend their pleadings by January 14, 2022.
- Expert Discovery:
  - Affirmative expert reports shall be served by February 1, 2022.
  - Rebuttal expert reports shall be served by March 1, 2022.

*Complete Expert Discovery by April 1, 2022.*

C. Any issues about disclosure, discovery, or preservation of electronically stored information, including the form or forms in which it should be produced.

- There are no issues at this time and the parties do not anticipate such issues in the future.

D. Any issues about claims of privilege or of protection as trial-preparation materials, including – if the parties agree on a procedure to assert these claims after production – whether to ask the court to include in their agreement and order under Federal Rule of Evidence 502.

- There are no issues at this time.

E. What changes should be made in the limitations on discovery imposed under these rules or by local rule, and what other limitations should be imposed.

- The parties do not believe that any changes or additional limitations are necessary.

F. Any other orders that the court should issue under Rule 26(c) or under Rule 16(b) and (c).

- Defendant to serve proposed Confidentiality Order on Plaintiff within thirty (30) days of the Initial Conference.


Dated: New York, New York  
July 27, 2021

**ROTH & ROTH, LLP**

/s/ David Roth

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Dispositive motions due April 27, 2022.  
Post Pre-Trial Order due 5/13/22 or 21 days after decision  
on dispositive motion.  
Ready Trial, 48 hours notice, 14 days after submission of  
Post Pre-Trial Order.  
Parties should advise by 8/10/21 whether they  
consent to trial before the Magistrate Judge.  
So ordered.  
Jr C/Kalt/4.5-DS.